

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

BRANCH BANKING AND TRUST §
COMPANY, §
§ Plaintiff, §
§ v. § Civil Action No.
§ REGIONS BANK, § 3:17-cv-003399-L
§ § Garnishee, and §
§ HARCHARAN SINGH NARANG M.D. §
P.A., NORTH CYPRESS CLINIC §
ASSOCIATES, P.A., HARCHARAN SINGH §
NARANG M.D., and RANJIT KAUR, §
§ Judgment Debtors. §

**ORIGINAL ANSWER OF REGIONS BANK
TO WRIT OF GARNISHMENT AFTER JUDGMENT**

TO THE HONORABLE JUDGE OF SAID COURT:

Now comes Regions Bank (“Regions”), garnishee in the above-entitled and numbered cause, and files this Original Answer to the Writ of Garnishment After Judgment issued on December 14, 2017, and in support thereof would show as follows:

I.

The writ was served on Regions on December 21, 2017.

II.

At the time of service, and subject to any right of setoff it may have, Regions was indebted to Harcharan Singh Narang, M.D. and Ranjit Kaur (collectively, “Narang”) in the amount of \$5,504.66 and indebted to Ranjit Kaur (“Kaur”) separately in the amount of \$306.95.

Regions was not indebted to Harcharan Singh Narang M.D., P.A. (“Narang P.A.”) or North Cypress Clinic Associates, P.A. (“North Cypress”).

III.

At the time of service, Regions was not in possession of any effects belonging to Narang, Kaur, Narang P.A. or North Cypress.

IV.

At the time of service, Regions had no knowledge of any other persons indebted to Narang, Kaur, Narang P.A. or North Cypress.

V.

At the time of service, Regions had no knowledge of any other person who had in his or her possession any effects of Narang, Kaur, Narang P.A. or North Cypress.

VI.

As of the date this answer was due, and subject to any right of setoff it may have, Regions was indebted to Narang in the amount of \$5,508.31 and indebted to Kaur in the amount of \$306.95. Regions was not indebted to Narang P.A. or North Cypress.

VII.

As of the date this answer was due, Regions was not in possession of any effects belonging to Narang, Kaur, Narang P.A. or North Cypress.

VIII.

As of the date this answer was due, Regions had no knowledge of any other persons indebted to Narang, Kaur, Narang P.A. or North Cypress.

IX.

As of the date this answer was due, Regions had no knowledge of any other person who had in his or her possession any effects of Narang, Kaur, Narang P.A. or North Cypress.

X.

As the result of this garnishment, Regions has been required to retain the undersigned law firm to represent it in this proceeding. Said attorneys have performed services on behalf of Regions, including telephone conversations with the representative of Regions, the collection and review of necessary papers in order to respond to said writ, and the preparation and filing of this answer. Regions is entitled to recover reasonable and necessary attorney's fees in an amount not less than Eight Hundred Fifty and 00/100 Dollars (\$850.00) for the services performed by this law firm.

WHEREFORE, premises considered, Regions prays that:

1. All claims to said funds be determined and adjudicated, and that Regions be discharged from any and all liability as to the plaintiff, Branch Banking and Trust Company, and defendants, Harcharan Singh Narang M.D. P.A., North Cypress Clinic Associates, P.A., Harcharan Singh Narang M.D., and Ranjit Kaur;
2. Regions have and recover from the garnishor or, alternatively, from the effects and garnished funds, if any, its reasonable and necessary attorney's fees in an amount of not less than \$850.00; and
3. Regions be granted such other and further relief, legal or equitable, special or general, to which it may show itself justly entitled.

Respectfully submitted,

By: /s/ Tate L. Hemingson

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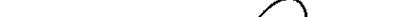
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**ATTORNEYS FOR GARNISHEE,
REGIONS BANK**

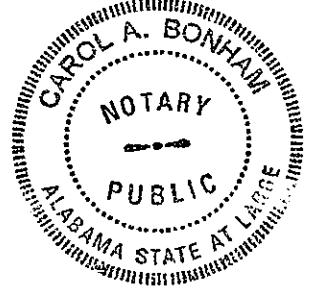
AFFIDAVIT OF JEANETTE PILLITTERI

STATE OF ALABAMA §
COUNTY OF JEFFERSON §

BEFORE ME, the undersigned notary public, on this day personally appeared Jeanette Pillitteri, Team Leader, Regions Bank (“Regions”), who being by me duly sworn on her oath said that she is an authorized agent for Regions with respect to this action, being Civil Action No. 3:17-cv-03399-L, In the United States District Court for the Northern District of Texas, Dallas Division, styled *Branch Banking and Trust Company v. Regions Bank and Harcharan Singh Narang M.D. P.A., North Cypress Clinic Associates, P.A., Harcharan Singh Narang M.D., and Ranjit Kaur*; that she has read the above and foregoing Original Answer to Writ of Garnishment After Judgment of Regions Bank in this case; and that every statement contained therein is within her personal knowledge and based upon her review of the records maintained by Regions Bank in the ordinary course and scope of her employment with said bank; and that every statement contained therein is true and correct.


JEANETTE PILLITTERI
Team Leader

SUBSCRIBED AND SWORN TO BEFORE ME on this 10th day of January, 2018.



Notary Public, State of Alabama

MY COMMISSION EXPIRES JUNE 23, 2021

CERTIFICATE OF SERVICE

I hereby certify that on January 11, 2018, a true and correct copy of the foregoing *Original Answer of Regions Bank to Writ of Garnishment After Judgment* was electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

Kenneth C. Johnston
Daniel S. Klein
Johnston Pratt PLLC
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Dallas, Texas 75201
Attorneys for Plaintiff

kjohnston@johnstonpratt.com
dklein@johnstonpratt.com

I further certify that on January 11, 2018, a true and correct copy of the foregoing *Original Answer of Regions Bank to Writ of Garnishment After Judgment* was served by certified mail, return receipt requested on the following interested parties:

Harcharan Singh Narang, M.D.
6622 Sunshine Creek
Houston, Texas 77041

**Via Certified Mail, Return
Receipt Requested No.
9214 7969 0099 9790 1618 9898 48**

Ranjit Kaur
6622 W. Nanaksar Drive
Houston, Texas 77041-2700

**Via Certified Mail, Return
Receipt Requested No.
9214 7969 0099 9790 1618 9899 30**

/s/ Tate L. Hemingson
TATE L. HEMINGSON